

Michael A. Barcott, SBA #73681
HOLMES WEDDLE & BARCOTT, P.C.
3101 Avenue, Suite 500
Seattle, Washington 98121
Telephone: (206) 292-8008
Facsimile: (206) 340-0289
Email: mbarcott@hwb-law.com

Attorneys for Limitation Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN THE MATTER OF THE COMPLAINT)	Case No. 4:20-cv-01384-HSG
OF ROBERT E. KELLEY AND RICHARD)	
E. KELLEY, SUCCESSOR CO-TRUSTEES)	RULE 9 (h), IN ADMIRALTY
AND BENEFICIARIES OF THE EUGENE)	
M. KELLEY AND VERA L. KELLEY)	STIPULATED MOTION AND ORDER
REVOCABLE LIVING TRUST, AS)	FOR RELEASE/CANCELLATION OF
OWNERS AND/OR OPERATORS OF THE)	SECURITY AND FOR DISBURSEMENT
VESSEL F/V MISS HAILEE, OFFICIAL)	OF REGISTRY FUNDS
NUMBER 524780, FOR EXONERATION)	
FROM AND/OR LIMITATION OF)	
LIABILITY)	

COMES NOW Limitation Plaintiff and moves the Court for an order for disbursement of registry funds initially deposited by Plaintiff in the principal amount of \$1,000.00. *See* Dkt. #12.

A decision by the Court was issued on August 19, 2021 regarding Default Judgment and closing the case. Plaintiff hereby requests that the \$1,000.00 in principal funds, plus all accrued interest be disbursed to the trust account of Holmes Weddle & Barcott, PC and mailed to 3101 Western Ave., Suite 500, Seattle, WA 98121.

1 DATED this 3rd day of November, 2021.

2 HOLMES WEDDLE & BARCOTT, P.C.

3 /s/Michael A. Barcott

4 Michael A. Barcott, SBA #73681
5 3101 Western Avenue, Suite 500
6 Seattle, Washington 98121
7 Telephone: (206) 292-8008
8 Facsimile: (206) 340-0289
9 Email: mbarcott@hwb-law.com
10 Attorney for Limitation Plaintiffs

11 ANDERSON CAREY WILLIAMS &
12 NEIDZWSKI

13 /s/Nicholas Neidzwski

14 Nicholas Neidzwski, CSB #273020
15 21 Bellwether Way, Suite 104
16 Bellingham, WA 98225
17 Telephone: 360-671-6711
18 Fax: 360-647-2943
19 E-mail: nick@boatlaw.com
20 Attorneys for Claimant/Respondent
21 GILBERTO SANTIAGO OTANEZ,
22 Personal Representative of the Estate of
23 ARNULFO SANTIAGO SOLIS

24 PURSUANT TO STIPULATION, the security posted by Plaintiff is
25 RELEASED/CANCELLED and the \$1,000.00 in principal funds, plus all accrued interest shall
26 be disbursed to the trust account of Holmes Weddle & Barcott, PC and mailed to 3101 Western
27 Ave., Suite 500, Seattle, WA 98121. IT IS SO ORDERED.

28 DATED this 4th day of November, 2021.



United States District Judge